

**Fill in this information to identify the case:**

Debtor 1 Gerald Fulton

Debtor 2  
(Spouse, if filing)

United States Bankruptcy Court for the: Eastern District of PA

Case number 19-15800 AMC

**Form 4100R**

**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

Name of Creditor: Lycaste LLC

Court claim no. (if known): 8

Last 4 digits of any number you use to identify the debtor's account: 2314

Property address:

7100 Pennsylvania Avenue  
Upper Darby, PA 19082

**Part 2: Prepetition Default Payments**

Check one:

☐ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☒ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$ 22,421.55

**Part 3: Postpetition Mortgage Payment**

Check one:

☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:	(a)	\$ <u>28,360.29</u>
b. Total fees, charges, expenses, escrow, and costs outstanding:	+ (b)	\$ <u>0.00</u>
c. <b>Total.</b> Add lines a and b.	(c)	\$ <u>28,360.29</u>

Creditor asserts that the debtor(s) are contractually obligated for 10 / 01 / 2019  
the postpetition payment(s) that first became due on:

Debtor(s) Gerald Fulton  
First Name Middle Name Last Name

Case Number (if known): 19-15800 AMC

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

*Check the appropriate box::*

- ☐ I am the creditor.  
☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

\*/s/ Mark A. Cronin  
Mark Cronin  
13 Dec 2023, 12:29:51, EST

Date 12/13/2023

KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 16106  
215-627-1322  
[bkgroup@kmlawgroup.com](mailto:bkgroup@kmlawgroup.com)  
Attorney for Creditor

Date		P+I Amount Due	Amount RCVD POST	Amount Applied POST	Balance Due POST	PMT Applied POST	Suspense Balance POST
9/17/19	BK Filed						\$124.11
2/1/21		\$813.84			\$813.84		\$124.11
3/1/21		\$813.84			\$1,627.68		\$124.11
4/1/21		\$813.84			\$2,441.52		\$124.11
5/1/21		\$813.84			\$3,255.36		\$124.11
6/1/21		\$813.84			\$4,069.20		\$124.11
7/1/21		\$813.84			\$4,883.04		\$124.11
8/1/21		\$813.84			\$5,696.88		\$124.11
9/1/21		\$813.84			\$6,510.72		\$124.11
10/1/21		\$813.84			\$7,324.56		\$124.11
11/1/21		\$813.84			\$8,138.40		\$124.11
12/1/21		\$813.84			\$8,952.24		\$124.11
1/1/22		\$813.84			\$9,766.08		\$124.11
2/1/22		\$813.84			\$10,579.92		\$124.11
3/1/22		\$813.84			\$11,393.76		\$124.11
4/1/22		\$813.84			\$12,207.60		\$124.11
5/1/22		\$813.84			\$13,021.44		\$124.11
6/1/22		\$813.84			\$13,835.28		\$124.11
7/1/22		\$813.84			\$14,649.12		\$124.11
8/1/22		\$813.84			\$15,462.96		\$124.11
9/1/22		\$813.84			\$16,276.80		\$124.11
10/1/22		\$813.84			\$17,090.64		\$124.11
11/1/22		\$813.84			\$17,904.48		\$124.11
12/1/22		\$813.84			\$18,718.32		\$124.11
1/1/23		\$813.84			\$19,532.16		\$124.11
2/1/23		\$813.84			\$20,346.00		\$124.11
3/1/23		\$813.84			\$21,159.84		\$124.11
4/1/23		\$813.84			\$21,973.68		\$124.11
5/1/23		\$813.84			\$22,787.52		\$124.11
6/1/23		\$813.84			\$23,601.36		\$124.11
7/1/23		\$813.84			\$24,415.20		\$124.11
8/1/23		\$813.84			\$25,229.04		\$124.11
9/1/23		\$813.84			\$26,042.88		\$124.11
10/1/23		\$813.84			\$26,856.72		\$124.11
11/1/23		\$813.84			\$27,670.56		\$124.11
12/1/23		\$813.84			\$28,484.40		\$124.11
Full amount minus suspense					\$28,360.29		

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Gerald Fulton Jr.**

**Debtor(s)**

**BK NO. 19-15800 AMC**

**Lycaste LLC**

**Movant**

**Chapter 13**

**vs.**

**Related to Claim No. 8-1**

**Gerald Fulton Jr.**

**Debtor(s)**

**Scott F. Waterman,**

**Trustee**

**CERTIFICATE OF SERVICE**

**RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT**

I, Mark A. Cronin of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on December 13, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)

Gerald Fulton Jr.  
7100 Pennsylvania Avenue  
Upper Darby, PA 19082

Attorney for Debtor(s) (via ECF)

David M. Offen, Esq.  
The Curtis Center  
601 Walnut Street  
Suite 160 West  
Philadelphia, PA 19106

Trustee (via ECF)

Scott F. Waterman  
2901 St. Lawrence Ave.  
Suite 100  
Reading, PA 19606

Method of Service: electronic means or first-class mail.

Dated: December 13, 2023

/s/ Mark A. Cronin

Mark A. Cronin Esquire  
Attorney I.D. 58240  
KML Law Group, P.C.  
BNY Mellon Independence Center  
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